

Emission Cap Permits

Department of Natural Resources
Air Permit Improvement Initiative
Work Group 4

Permit Streamlining - August 30,
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Emission Cap Permits: *Definition*

- Alternative type of operation permit
- Caps facility wide emissions
- Allows waivers from certain requirements provided emissions stay below cap
- Negotiated with and tailored to a specific facility
- Issuance follows traditional process including a public notice and comment period

Emission Cap Permits: *Possible Waivers*

- Construct/modify/replace equipment prior to obtaining construction permit
- Operate new/modified equipment prior to obtaining construction permit
- Waivers from certain process specific limitations
- Waivers from other requirements (e.g. record keeping, monitoring)

Emission Cap Permits: *Issues to Discuss*

- Problems with traditional permits that ECPs would address
- Design issues
- PAL option for ECPs
- Other options in lieu of ECPs

Emission Cap Permits: *Problem Areas*

- What problems with traditional permits would ECPs address?
 - Amount of time required to get construction permits
 - Greater flexibility to respond to customer demands
 - Need to permit replacement equipment
 - Burdensome record keeping and monitoring requirements
 - Lack of flexibility to show compliance on a facility wide basis
 - Others

Emission Cap Permits: *Design Issues*

- Scope
 - Waiver from Construction permit requirements
 - Waiver from certain process specific limitations
 - Waiver from other applicable requirements
- Source Eligibility
 - PSD minors –vs- Part-70 minors
- Establishment of Emission Caps
- Duration/Renewal

Emission Cap Permits: *Design Issues* (*cont'd*)

- Revocation Procedures and Implications
- Emission Cap changes
 - Procedures and implications
- Air Quality Concerns
 - Protecting NAAQSs and AACs
 - PSD increment consumption
- Level of review required for equipment changes/additions

Emission Cap Permits: *Questions*

- Are ECPs necessary in light of other changes proposed under AP11?
- Are they a reasonable approach to greater flexibility and reduced turnaround time for construction permits?
- Will there be enough interest to make development of this option worthwhile?

Emission Cap Permits: *Questions*

(cont'd)

- Can this option be developed in such a way that the DNR can protect public health and the environment without ECPs being overly complex?
- Can we develop a streamlined review process for new construction under an ECP that:
 - meets permittees' needs
 - protects health and environment
 - can be reasonably implemented by existing DNR staff?